



2600 Maitland Center Pkwy.
Suite 300
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL
32790-0200
Tel: 407-740-8575
Fax: 407-740-0613
www.tminc.com

February 27, 2009
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2008
Custom Teleconnect, Inc. - Form 499 Filer ID 815080**

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of Custom Teleconnect, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to
Custom Teleconnect, Inc.

Attachments

MB/sp

cc: FCC Enforcement Bureau (2 copies)
Best Copy and Printing (via email to FCC@BCPIWEB.COM)
D. Morgan – Custom Teleconnect
file: Custom Teleconnect - CPNI
tms: FCCx0901

Annual 64.2009(e) CPNI Certification for: Calendar Year 2008
Date Filed: February 27, 2009
Name of Company covered by this certification: Custom Teleconnect, Inc.
Form 499 Filer ID: 815080
Name of Signatory: Vicki Crowder
Title of Signatory: President

I, Vicki Crowder, certify and state that:

1. I am the President of Custom Teleconnect, Inc. and, acting as an agent of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. Section 64.2001 *et seq.*
2. Attached to this certification as Exhibit A is an accompanying statement explaining how Custom Teleconnect, Inc.'s procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Vicki Crowder
Vicki Crowder, President
Custom Teleconnect, Inc.

2/26/09
Date

Custom Teleconnect, Inc.

Statement of CPNI Procedures and Compliance

Custom Teleconnect, Inc. ("Company" or "CTI") operates solely as a provider of operator services to pay telephones and hospitality locations and as a provider of inmate operator services to confinement facilities. As such CTI provides only operator assisted call completion services to transient users. Therefore, all of its services consist of casual traffic provided outside of any subscribed service relationship. Moreover, CTI does not market its services to end users in any fashion. Its marketing efforts are directed towards aggregators and such efforts do not include the use of CPNI.

The Company does not bill customers directly. Instead, the Company provides rated call records to billing companies and billed calls appear on the customer's local exchange company bill or credit card bill. To the extent that the billing companies act as agents for the Company and provides call detail information to customers over the telephone, Custom Teleconnect has contacted its billing company and received written assurance of the billing company's compliance with 47 CFR Subpart U.

In lieu of contacting the Company's billing companies, Customers may contact CTI directly to review or discuss the CTI portion of the LEC bill. If a customer is not able to provide the call detail information to qualify for the FCC exemption, the Company requires the customer to either call back with the information, or fax a copy of the bill pages directly to CTI and CTI will call back at the telephone number of record.

Procedures have been in place since the Company's inception in 1993 to protect the privacy of call detail from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to such information. The Company reviews CPNI procedures annually with all employees and has instituted a corresponding disciplinary process to ensure that its employees understand and comply with restrictions regarding the use and disclosure of, and access to CPNI and call detail records.

Custom Teleconnect, Inc.

Statement of CPNI Procedures and Compliance
(Page 2)

The Company does not provide web access to customer records. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of changes.

The Company has in place procedures to maintain records of all breaches of call detail records and CPNI discovered, and to notify law enforcement, the United States Secret Service and the FBI in the event of a breach of customers' CPNI and/or call detail records, and to ensure that customers are notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

The Company does not have any retail locations and therefore does not disclose CPNI at in-store locations.

Law enforcement requests for call detail records are only granted if submitted by verified law enforcement agencies.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or call records in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call records.

Custom Teleconnect, Inc.

Statement of CPNI Procedures and Compliance
(Page 3)

Should CTI expand its business in the future to include the provision and/or marketing of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical or account information, that it notifies customers of account changes.